



February 9, 2017

Ms. Pamela Creedon, Executive Officer  
California Regional Water Quality Control Board  
Central Valley Region  
11020 Sun Center Drive, Suite #200  
Rancho Cordova, California 95670-6114

RE: RICE PESTICIDE PROGRAM SUMMARY OF EXISTING  
MANAGEMENT PRACTICE RECOMMENDATIONS FOR 2017

Dear Ms. Creedon:

The California Rice Commission (CRC) manages the Rice Pesticide Program (RPP) and implements water quality monitoring and reporting activities in compliance with the RPP pursuant to the Conditional Prohibition of Discharge requirements in the Basin Plan. Monitoring and reporting requirements for the 2016 RPP are specified in Resolution No. R5-2010-9001.

This letter serves as a review of the 2016 RPP program and offers recommendations for the 2017 program for your consideration.

### **Monitoring Summary**

In 2016, there were six exceedances of the 1.5  $\mu\text{g/L}$  thiobencarb Basin Plan Performance Goal. Three exceedances occurred at the Colusa Basin Drain 5 (CBD5) site (Colusa County) from May 17 to May 26 (1.9, 5.25, 11.0, 2.2  $\mu\text{g/L}$ ). Three exceedances occurred at the Colusa Basin Drain 1 (CBD1) site (Yolo County) from May 24 to May 26 (3.2, 2.8  $\mu\text{g/L}$ ).

The cities of Sacramento and West Sacramento had no exceedances of the secondary maximum contaminant level (MCL) of 1.0  $\mu\text{g/L}$ . The City of West Sacramento reported a detection of 0.13  $\mu\text{g/L}$  and the City of Sacramento had a detection of 0.11  $\mu\text{g/L}$  on June 2.

### **Overview of the 2016 Season**

The 2016 season was notable for the continued impacts of the drought both on flows as well as water district restrictions placed on growers. Increased weed pressure is also considered a factor. In addition, changes to inspection patterns were observed.

Following are key considerations in the 2016 season.

- 1) The most significant change in conditions impacting monitoring results was the decrease in flows and water depth at the monitoring sites, particularly at CBD5. Per the condition of the program approval last year, the CRC began

evaluating normal rain year data compared to the current drought impacted conditions at CBD5. In 2016, the CRC undertook an evaluation of flows, as noted in the 2016 approval letter:

“assess use-to-flow variances resulting from weather conditions and drought requirements to determine whether recommendations related to thiobencarb use are appropriate [e.g., consideration of additional practices that may be implemented in drought years].”

The CRC has completed the assessment and will follow-up with Regional Board staff to review the findings and work collaboratively on future studies.

- 2) No-spill mandates by the irrigation districts continue and drive an increase in use of non-contact herbicides such as thiobencarb. These practices, initiated by the districts to conserve water by only allowing grower to flood fields a single time, are believed to have a significant impact on thiobencarb use. Contact herbicides that require draining of the field, application of the herbicide and then re-flooding are disfavored in these conditions. Thiobencarb, an in the water herbicide which does not have the drain and re-flood requirement, is used more broadly.
- 3) Thiobencarb is good rotational herbicide for sedge weed control. The industry is experiencing an increase in thiobencarb usage which began in 2014. From 2006 to 2013, the use trend was in decline resulting from the sedge weed resistance to thiobencarb. Thiobencarb was out of the rotation long enough to now be effective against the broad leaf weeds.
- 4) In 2016, the number of waterhold and seepage inspections declined, but violations increased in Colusa, Glenn and Sutter Counties.
- 5) Other factors included evaluation of the wind speed and precipitation during the use season. It does not appear weather was a contributing factor to the exceedances.

### **2017 RPP Recommendations**

In developing the following recommendations, the CRC recognizes the Performance Goal exceedances in the drains and also notes that the secondary MCL was not in violation. In addition, the CRC would like to maintain reasonable use of thiobencarb when water conditions return to normal for the nine rice-growing counties in the Sacramento Valley.

#### **The CRC proposes the following additional requirements in 2017:**

- Coordination with DPR on monitoring two alternative sites north of the CBD5 location. The monitoring would be part of the DPR surface water program with the CRC providing laboratory analysis.
- The CRC completed the required assessment of use-to-flow variances resulting from weather conditions and drought related irrigation requirements. The assessment will be shared with Regional Board staff to review the findings and work collaboratively on future studies.

- Targeted area in Colusa and Glenn Counties north of Highway 20 and west of Sacramento River limited to ground only applications of the thiobencarb liquid formulation.

**From the RPP Resolution and the 2016 approval letter, the CRC commits to continue the following:**

- The CRC will implement aggressive efforts to implement additional, targeted industry outreach and education to growers, PCAs, applicators, dealers, and distributors during the 2017 season. Examples include:
  - Continuance of the mandatory thiobencarb stewardship meetings
  - Support the CACs if actions are taken against an individual for repeated non-compliance
  - Increase outreach with emphasis on counties where violations occur
  - Maintain contact with applicators and pesticide crop advisors
  - Continue increased funding to counties for off-hours surveillance inspections.
  - Outreach via letters and the [www.calricenews.org](http://www.calricenews.org) website with emphasis on the counties where violations occur
- The CRC plans to continue the approved recommendations as outlined in Resolution No. R5-2010-9001.
- Continue to implement the RPP water quality monitoring and reporting activities consistent with Resolution No. R5-2010-9001.
- Continue stakeholder outreach activities including collaboration with the cities, DPR, CACs, and the Regional Board.

The CRC supports the Regional Board staff in utilizing the stakeholder process, and maintaining the procedure for an effective water quality program. Thank you for your consideration of our recommendations. Please contact me if you have any questions, or require additional information.

Sincerely,



Tim Johnson  
President & CEO

cc: Ms. Ashley Peters, Central Valley Regional Water Quality Control Board  
Mr. George Farnsworth, Department of Pesticide Regulation  
Ms. Donna Marciano, Department Pesticide Regulation  
Mr. Ken Everett, Department of Pesticide Regulation  
Dr. Robin R. Charlton, Valent, U.S.A. Corporation